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21 IN THE UNITED STATES DISTRICT COURT
22 SOUTHERN DISTRICT OF CALIFORNIA (SAN DIEGO)

23 WHITEWATER DRAW)
24 NATURAL RESOURCE)
25 CONSERVATION DISTRICT, *et*)
26 *al.*,)

27 Plaintiffs,)

28 v.)

29 KELLY, *et al.*,)

30 Defendants.)

Case No. 3:16-cv-2583

**JOINT MOTION FOR AN
EXTENSION OF TIME FOR
FEDERAL DEFENDANTS
TO RESPOND TO COMPLAINT**

1 The parties have conferred and respectfully request a thirty-day extension of
2 the deadline for Federal Defendants to respond to Plaintiffs' Complaint, which
3 would make a responsive pleading due on May 30, 2017 (following the federal
4 holiday on May 29). In support of this motion, the parties state the following:
5

6 1. Under Rule 12(a)(2) of the Federal Rules of Civil Procedure, Federal
7 Defendants' response to Plaintiffs' complaint was due on December 27, 2016.
8

9 2. On December 8, 2016, Defendants filed a Joint Motion for an
10 Extension of Time for Federal Defendants to Respond to Plaintiffs' Complaint.
11 The Court granted Defendants' motion on December 12, 2016, providing that a
12 response to the Complaint would be due February 27, 2017.
13

14 3. On February 15, 2017, Defendants filed a second Joint Motion for an
15 Extension of Time for Federal Defendants to Respond to Plaintiffs' Complaint.
16 The Court granted the motion on February 17, 2017, providing that a response to
17 the Complaint would be due April 28, 2017.
18

19 4. To allow for further review of this case by the Department of
20 Homeland Security and to accommodate upcoming discussions between the
21 Department and Plaintiffs concerning the future course of this case, including
22 settlement discussions, the parties jointly request a further 30-day extension of
23 time to respond to the Complaint, to May 30, 2017. The Parties have scheduled a
24 meeting on May 8, 2017.
25
26
27
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1 Accordingly, the parties hereby agree to an extension, until May 30, 2017,
2 for Federal Defendants to respond to the Complaint and request that the Court
3 enter an order granting such an extension.
4

5 Respectfully submitted on this 24th day of April, 2017.

6
7 /s/ Julie B. Axelrod
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Signature Certification

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to Julie Axelrod, counsel for Plaintiffs, and that I have obtained Ms. Axelrod's authorization to affix her electronic signature to this document.

/s/ David B. Glazer

David B. Glazer

Attorney for Federal Defendants